

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Rocco Ciofoletti, on behalf of themselves  
and all others similarly situated,

Case No. 0:18-cv-03025 (JNE/ECW)

Plaintiff,

v.

Securian Financial Group, Inc., Minnesota  
Life Insurance Company, Securian Life  
Insurance Company, and Minnesota Mutual  
Companies, Inc.

Defendants.

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**Local Rule 7.1(c) Word Count Compliance Certificate Regarding  
Memorandum in Support of Defendants' Partial Motion to Dismiss  
Plaintiff's Complaint for Failure to State a Claim**

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I, Shawn M. Raiter, certify that the Memorandum in Support of Memorandum in  
Support of Defendants' Partial Motion to Dismiss Plaintiff's Complaint for Failure to State a  
Claim complies with Local Rule 7.1(c).

I further certify that, in preparation of this Memorandum, I used Microsoft Word  
2010, and that this word processing program has been applied specifically to include all text,  
including headings, footnotes, and quotations in the following word count.

I further certify that the above-referenced Memorandum contains 3,080 words.

Dated: December 14, 2018

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